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January 29, 2021

VIA ECF

Hon. Naomi Reice Buchwald, U.S.D.J. United States District Court Southern District of New York 500 Pearl Street New York, New York 10007-1312

Re: Cesari S.R.L. v. Peju Province Winery L.P. et al.

Case No. 17-cv-00873 (NRB)

Dear Judge Buchwald:

We are counsel to Peju Province Winery L.P., Peju Family Operating Partnership, L.P., and Peju Province Corporation (collectively, "defendants") in connection with the above-captioned matter. We write to the Court now pursuant to § H(2) of Your Honor's Individual Practices in search of leave to file documents in connection with defendants' motion for sanctions under seal. Specifically, the documents we request be filed under seal are:

- The Declaration of Kandiss Schulz with one accompany exhibit;
- The Declaration of Ariana Peju;
- The Declaration of Joel MacMull with three accompany exhibits;

The basis for defendants' request that these documents be sealed arises from their inclusion of confidential and/or proprietary financial information as it pertains to the defendants' business operations.

Application granted,

pending further review by

the Court.

NAOMI REICE BUCHWALD UNITED STATES DISTRICT JUDGE

Dated: New York, New York

February 1, 2021

Joel G. MacMull

Respectfully submitted,

cc: All Counsel of Record (via ECF only)